

Exhibit 7

[CAP/SIG retrieved by: [Initials] on 5/17/18 at 12:06 p.m.]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re FACEBOOK BIOMETRIC
INFORMATION PRIVACY LITIGATION

) Master File No. 3:15-cv-03747-JD

) CLASS ACTION

) This Document Relates To:

) DECLARATION OF CARLO LICATA

) ALL ACTIONS.

1 I, Carlo Licata, declare as follows:

2 1. I am a citizen of the state of Illinois and I am one of the three Class
3 Representatives in the above referenced case against Facebook.

4 2. I respectfully submit this Declaration in support of the \$650,000,000 settlement
5 (the "Settlement") of this case between the plaintiffs and the certified Class of Facebook users
6 for whom Facebook created or stored a face template from June 7, 2011 and Facebook.

7
8 3. I have directly participated in the case from its inception. To my knowledge, I was
9 the first-ever individual to assert their rights in a suit brought under the Illinois Biometric
10 Privacy Act. Since that time I have been kept fully informed of case developments and
11 procedural matters over the course of the this case, including regular correspondence with my
12 lawyers at Edelson PC concerning discovery, class certification, summary judgment, Ninth
13 Circuit briefing and review, the potential for United States Supreme court review, settlement
14 negotiations, and the ultimate proposed resolution of this case. Specifically, as part of my role
15 as class representative in this case I searched for, identified, and provided relevant documents
16 and information in response to discovery requests from Facebook, and sat for two depositions,
17 the first on February 17, 2016, and then on October 24, 2017. I also worked closely with my
18 lawyers at Edelson PC to prepare for these depositions, and to prepare a declaration in support of
19 Plaintiffs' Motion for Class Certification. In addition, the Court-ordered mediation that was
20 scheduled took place during my honeymoon. I attended that mediation by phone, which took
21 place overnight where I was at the time.
22

23
24 4. Altogether, I would estimate that I have expended at least 55 hours participating
25 in and helping to oversee this litigation on behalf of the Class.

26 5. I have discussed with counsel and evaluated the risks of continuing the case and
27 authorized counsel to settle this matter for \$650,000,000 for Class Members and non- monetary
28

1 relief including the requirement that Facebook turn off Facial Recognition for everyone in the
2 Class unless those people provided their informed choice to turn it back on (and that all face
3 templates will be deleted if people don't agree to turn it back on). I believe this Settlement is fair
4 and reasonable and is in the best interest of the Class members.
5

6
7 I declare under penalty of perjury that the foregoing is true and correct.
8

9 Executed this ⁰⁹_____ day of October 2020 at Chicago, Illinois.
10

11 *Carlo Licata*

12 _____
CARLO LICATA
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28